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Attorneys for Plaintiff  
ELIZABETH CHAVEZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ELIZABETH CHAVEZ,

Plaintiff,

v.

MAYA NIGHTCLUB, INC.; HOWARD  
BALDWIN CRITTENDEN III, AS  
TRUSTEE OF THE CRITTENDEN  
REVOCABLE TRUST, DATED MAY 5,  
1999,

Defendant.

Case No. 3:24-cv-00207-SK

Civil Rights

**STIPULATION AND [PROPOSED]  
ORDER DISMISSING CASE WITH  
PREJUDICE**

Action Filed: January 11, 2024

**STIPULATION**

Plaintiff ELIZABETH CHAVEZ (“Plaintiff”) and Defendants MAYA NIGHTCLUB, INC.; and HOWARD BALDWIN CRITTENDEN III, AS TRUSTEE OF THE CRITTENDEN REVOCABLE TRUST, DATED MAY 5, 1999 (“Defendants”) – Plaintiff and Defendants together the “Parties” – hereby stipulate and request that pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), the above-captioned action be dismissed with prejudice in its entirety. Each side shall pay its own attorneys' fees and costs.

Defendants shall do corrective work specified in a separate settlement agreement executed by the Parties that resolves all claims, including injunctive relief remedies. Defendants shall have 120 days to remove the barriers as set forth therein, to the extent not already done.

The Court will retain jurisdiction to enforce the agreement for 180 days pursuant to General Order 56, extendable upon a showing of good cause.

**IT IS SO STIPULATED.**

Dated: July 1, 2024

REIN & CLEFTON

/s/ Aaron M. Clefton

By: AARON M. CLEFTON, ESQ.

Attorneys for Plaintiff

ELIZABETH CHAVEZ

Dated: July 1, 2024

THE KARLIN LAW FIRM LLP

/s/ Rex T. Reeves

By: REX T. REEVES, Esq.

Attorneys for Defendants

MAYA NIGHTCLUB, INC.; and HOWARD  
BALDWIN CRITTENDEN III, AS TRUSTEE OF  
THE CRITTENDEN REVOCABLE TRUST,  
DATED MAY 5, 1999

**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1, I hereby attest that on July 1, 2024, I, Aaron Clefton, attorney with Rein & Clefton, received the concurrence of Rex T. Reeves, Esq. in the filing of this document.

/s/ Aaron Clefton

Aaron Clefton

**ORDER**

Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2024

\_\_\_\_\_  
Honorable Sallie Kim  
U.S. Magistrate Judge